

### **REMARKS**

This amendment is being filed in response to the Office Action dated October 18, 2006. In that Action, the Examiner objected to Claims 23-24 regarding a clerical dependency error. Claims 1, 3, 4, 6, 9, 12, 14, 15, 17, 20, 22, 23 and 25 were rejected under 35 U.S.C. §102(b) as being anticipated by Teig. Claims 2, 5, 7, 8, 10, 11, 13, 16, 18, 19, 21, 24, 26 and 27 were indicated as being allowable if properly rewritten.

With respect to the clerical error in Claim 23, Applicants have amended that claim to correct the error, and thank the Examiner for pointing it out.

With respect to the §102(b) rejections, Applicants would respectfully submit that Teig does not anticipate the present invention because that reference fails to teach the calculation of a stability value based on the movement of cell locations from a first design layout to a second design layout. Teig is directed to a method of computing placement costs in the design of a circuit layout, i.e., determining how complicated it will be to carry out the placement operation for a given netlist. The problem addressed by Teig relates to a need for a placer (a placement tool) that considers diagonal wiring in calculating placement costs.

Applicants' invention, in contrast, is not a placer or a method of computing placement costs. Rather, Applicants' invention is a stability metric that characterizes the convergence of a given placement tool. The various placers discussed in Teig merely compare relative placement scores to determine which of two placements is better. This comparison is a qualitative and provides no information about the stability of the placement tool. In contrast, the present invention calculates a specific value representative of the stability of the placement tool, based on two or more different placement layouts. This stability value allows the designer to make reliable comparisons between different placement systems and select a more appropriate tool for his particular netlist. Teig mentions several placement tools, but one skilled in the art would not understand it to refer to Applicants' inventive subject matter of a metric to quantify the stability of a placer.

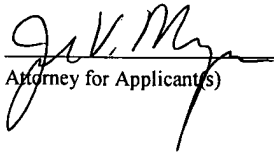
Each of Applicants' independent claims (Claims 1, 12 and 20), as originally filed, recited the calculation of a stability value based on the movement of respective cell locations from at

least two different layouts. Since Tieg does not teach each and every element of Applicants' claims, it accordingly cannot anticipate the present invention.


Notwithstanding the foregoing, and to expedite the prosecution of this application, Applicants have amended Claim 1 to incorporate the recitations of Claim 2, and similarly amended Claims 12 and 20 to incorporate the recitations of Claims 13 and 21 respectively. Inasmuch as Claims 2, 13 and 21 were originally allowable, Claims 1, 12 and 20 (and all claims depending therefrom) are now likewise allowable. Claims 2, 13 and 21 have accordingly been deleted. For all of the foregoing reasons, Applicants respectfully request reconsideration of the §102(b) rejections.

Applicants have also rewritten allowable Claims 7, 18 and 26 in independent form (including their base and intervening claims) as new Claims 28-30. Please charge the fee of \$600.00 due under 37 C.F.R. §1.16(h) for the presentation of three extra independent claims to deposit account 09-0447.

Applicants have made a diligent effort to advance the prosecution of this application by amending claims, deleting others, and pointing out with specificity how the claims as presented patentably define the invention over the prior art of record. In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Commissioner for Patents, Mail Stop Amendment, P.O. Box 1450, Alexandria, VA 22313-1450, on January 18, 2006.	
 Attorney for Applicant(s)	<u>Jan. 18, 2006</u> Date of Signature

Respectfully submitted,

  
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